

1 CODE:  
2 JESSE KALTER LAW, P.C.  
3 Jesse B. Kalter, Esq.  
4 Nevada Bar No. 9846  
5 780 Vista Blvd., Ste 500  
6 Sparks, NV 89434  
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9 Attorney for RAFAEL ALVAREZ

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11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

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14 UNITED STATES OF AMERICA,

15 Plaintiff,  
16 vs.

Case No. 14-CV-00506

17 \$102,283.44 IN UNITED STATES CURRENCY  
18 SEIZED FROM BANK OF AMERICA  
19 ACCOUNT,

20 Defendant.

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21 **ANSWER TO COMPLAINT FOR FORFEITURE IN REM**

22 COMES NOW, RAFAEL JIMENEZ-ALVAREZ, by and through his attorney, JESSE B.  
23 KALTER, ESQ., and answers Plaintiff's Complaint, filed October 1, 2014, as follows:

24 That Mr. Jimenez-Alvarez admits the allegations contained in Paragraphs  
25 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,18,19,20 and 21 of Plaintiff's Complaint.

26 The Mr. Jimenez-Alvarez denies each and every allegation contained in Paragraphs 17,22,23  
27 and 24 of Plaintiff's Complaint.

28 WHEREFORE, RAFAEL JIMENEZ-ALVAREZ prays for the following relief:

- 29 1. Plaintiff take nothing by virtue of their Complaint filed October 1, 2014, and that all  
30 property seized by Plaintiff be immediately returned to Rafael Jimenez-Alvarez.
- 31 2. For such other relief as the Court deems just and proper.
- 32 3. For Attorney's fees and costs of defending the lawsuit.

1 DATED this 14 day of November, 2014.

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4 JESSE KALTER LAW, P.C.

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7 JESSE B. KALTER, ESQ.  
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Nevada Bar #9846

ATTORNEY FOR RAFAEL JIMENEZ-ALVAREZ  
780 Vista Blvd., Ste 500  
Sparks, NV 89434

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1 **VERIFICATION**

2 STATE OF NEVADA )  
3 COUNTY OF CARSON ) ss.

4 I, RAFAEL JIMENEZ-ALVAREZ, being first duly sworn, declare under PENALTY OF  
5 PERJURY that the below listed assertions are true, and depose and say that:

6 I have read the foregoing ANSWER TO COMPLAINT FOR FORFEITURE and know  
7 the contents thereof; the same is true and correct as to my own knowledge, except as to those  
8 matters therein stated upon information and belief, and as to such matters, I believe them to be  
9 true.

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11  
12 RAFAEL JIMENEZ-ALVAREZ

13 SUBSCRIBED AND SWORN to before  
14 me, by RAFAEL JIMENEZ-ALVAREZ, on this 14  
15 day of November, 2014.



16   
17 NOTARY PUBLIC

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**CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of JESSE KALTER LAW, P.C.,  
3 and that on this date I deposited for mailing, by first class mail, at Sparks, Nevada, a true copy of  
4 the foregoing document to:

United States Attorney  
ATTN: Greg Addington, Esq.  
100 W. Liberty Street, Ste 600  
Reno, NV 89501

DATED this 14 day of November, 2014.

Jessica Comby